

EXHIBIT 11

Nancy Crowther

June 17, 2022

UNITED STATES DISTRICT COURT
for the
WESTERN DISTRICT of TEXAS

LA UNION DEL PUEBLO
ENTERO, et. Al.

Plaintiff,

V.

GREGORY W. ABBOTT, et al.

Defendant.

Civil Action No.
5:21-cv-00844-XR

ORAL AND VIDEOTAPED DEPOSITION OF

NANCY CROWTHER

June 17, 2022

OBAL AND VIDEOTAPED DEPOSITION OF NANCY CROWTHER

produced as a witness at the instance of the Plaintiff, and duly sworn, was taken in the above-styled and -numbered cause on the 17th day of June, 2022, from 10:08 a.m. to 3:14 p.m., before Karen A. Gonzalez, Commissioned Notary, in and for the State of Texas, reported by machine shorthand, remotely from Dallas County, Texas, pursuant to the Texas Rules of Civil Procedure, the Texas Supreme Court Emergency Order Regarding the Covid-19 State of Disaster and the provisions stated on the record or attached hereto.

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1 the sort of help that you will need in the future -- not
2 that you need right now, but that you will need in the
3 future. Is that your concern?

4 MS. SIFUENTES-DAVIS: Objection, form.

5 A. That's part of the concern.

6 Q. (BY MR. HERBERT) Okay. What's the rest of the
7 concern?

8 A. That something as meaningful as voting is to me,
9 that I need assistance with now, much less more in the
10 future, has now a bump, or speed bump, in the process,
11 to where now it's become more threatening to bring an
12 attendant in because they have to sign something that
13 says, Legally, if you do X, Y, and Z, you are in
14 violation of this law.

15 And it's like, why would I want to bring a
16 person, much less my attendant, into that role and have
17 them get all freaked out about, You mean to tell me if I
18 help you do something that is not on this form or I do
19 something that is on this form, I could get in trouble?

20 And it's just not worth it when your life is
21 dependant on your attendant or your caregiver or your
22 spouse or anything. It's just not worth it.

23 Q. Okay. So let me -- let me try and -- correct me
24 if I'm wrong, but let me try and categorize the concerns
25 that you have with the oath, and then we can talk about

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1 really quick questions.

CROSS-EXAMINATION

BY MS. SIFUENTES-DAVIS:

Q. You testified that your attendant had not been required to take the new assisters' oath thus far.

Do you know if that will continue to be the case in the future?

MR. HERBERT: Objection, form.

A. That just depends if they enforce it.

Q. (BY MS. SIFUENTES-DAVIS) And are you concerned that your attendant may be required to take this new oath in the future?

MR. HERBERT: Objection, form.

A. Yes.

Q. (BY MS. SIFUENTES-DAVIS) I don't have any other questions.

Would you like to read and sign?

A. Yes.

MS. SIFUENTES-DAVIS: Off the record.

THE VIDEOGRAPHER: Off the record at

3:14 p.m.

(Conclusion of deposition at 3:14 p.m.)